REMARKS

Applicants reply to the Office Action dated May 7, 2009 within three months. Claims 24-33 and 39-50 are pending in the application and the Examiner rejects claims 24-33 and 39-50. Applicants incorporate subject matter from claim 27 into amended claim 24 and amended claim 31. Applicants add new claims 51-53 that include subject matter from claims 25, 42, and 49. Applicants therefore assert that no further search is required because the Examiner has already examined claims 24, 25, 27, 31, 42, and 49, and any subsequent Office Action should therefore not be a Final Office Action. Support for the amendments may be found in the originally-filed specification, claims, and figures. Applicants respectfully request allowance of this application.

The Examiner rejects independent claims 24 and 31 on three separate and independent grounds, so this Reply addresses each ground in turn.

102(b) and 103(a) Rejections Based on Everett and Hyuga

The Examiner rejects claims 24-26, 28-32, 39-40, and 42-50 under 35 U.S.C. § 102(b) as being anticipated by Everett, Jr. et al., U.S. Patent No. 5,202,661 ("Everett"). Although Applicants respectfully disagree with this rejection, Applicants present amendments to the claims to clarify the patentable aspects of the claims and to expedite prosecution.

The Examiner rejects claim 27 under 35 U.S.C. § 103(a) as being unpatentable over Everett in view of Hyuga, U.S. Patent No. 5,818,733 ("Hyuga"). Applicants do not admit that Hyuga is prior art with respect to this application, and Applicants reserve the right to antedate Hyuga. *Applicants traverse this rejection of claim 27.*

Everett discloses a "system for detecting intrusion into a secured environment using both fixed and mobile intrusion detectors . . . The mobile sensors are mounted on one or more mobile platforms which selectively patrol throughout the environment and may be rapidly deployed to any region in the environment where a fixed intrusion detector detects a possible intrusion" (Abstract). "The sensor suite onboard the mobile robot contains multiple, high resolution sensors of different types that are automatically oriented towards the potential *intruder*" (2:31-34; emphasis added). Therefore, Everett teaches against amended independent claims 24 and 31 and against previously presented dependent claim 27 (hence, the traversal of the rejection of claim 27). In particular, Everett teaches against "receiving, from a mobile target unit, second data associated with the object, wherein the mobile target unit comprises a sensor configured to detect the second data, and *wherein the mobile target unit is at least one of: mounted in the*

object, mounted on the object, carried in the object, or carried on the object" (claim 24; emphasis added). If Everett's "intruder" were to carry Everett's "mobile robot," it would render Everett inoperable. For at least that reason, Everett is not properly cited against claims 24, 27 and 31, alone or in combination with Hyuga[1] or any other reference, and Applicants respectfully request allowance of claims 24, 27 and 31.

102(e) Rejections Based on Moengen

The Examiner rejects claims 24-33 and 39-50 under 35 U.S.C. § 102(e) as being anticipated by Moengen, U.S. Patent No. 6,373,508 ("Moengen"). Applicants do not concede that Moengen is prior art with respect to this application, and Applicants reserve the right to antedate Moengen. Applicants' amendments presented with this Reply are not presented in response to Moengen, and Applicants therefore respectfully *traverse the rejections based on Moengen*.

Moengen discloses "a method for manipulation of a movable object displayed in a television picture, [where] the distance between the object and fixed basic positions is detected at a time t together with the distance between the object and a television camera in a *known position*" (Abstract; emphasis added). "Both the position detectors [D] and the television cameras [K] are positioned in a *pre selected x,y,z coordinate system* . . . The positions of both the position detectors [D] and the cameras [K] *are precisely defined* in the x,y,z co-ordinate system" (5:51-59; emphasis added). "Where mobile cameras . . . are used, it will be possible to determine the *camera positions* by means of the position detectors [D]" (12:28-31; emphasis added). "[T]he position *of a mobile camera* . . . is determined by means of GPS and transferred to the production location" (16:17-20). "Four position detectors [D] are preferably used to achieve unambiguous detection of the position of the natural object N. The position *of the object N* is thereby *solely* determined by *distance* measurements, i.e. by trilateration" (6:39-43; emphasis added). "The detected distances are given to a computing module 2 which by means of trilateration calculates the positions x,y,z at different times t and thereby also the path of the object N *on the basis of positions detected* at the different times t" (7:4-8; emphasis added). Because "the position of [Moengen's] object N is . . . *solely* determined by distance measurements [of fixed position detectors D]" (6:39-43; emphasis added) (see also 5:51-59),

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[1] Applicants discussed Hyuga in a previous Reply. As noted above, regardless of what Hyuga discloses, a rejection based on Everett is not proper.

Moengen does not disclose or contemplate, alone or in combination with any of the cited references, "a processor configured to correlate the first data and the second data to generate object location information"[2] as recited in claim 24, and as similarly recited in claim 31. Applicants therefore respectfully request withdrawal of these rejections.

103(a) Rejections Based on Barnard and Akiyoshi

The Examiner rejects claims 24, 27 and 31 under 35 U.S.C. § 103(a) as being unpatentable over Barnard, U.S. Patent No. 5,119,102 ("Barnard") in view of Akiyoshi, et al., U.S. Patent No. 5,617,100 ("Akiyoshi"). Applicants do not concede that Akiyoshi is prior art with respect to this application, and Applicants reserve the right to antedate Akiyoshi. Applicants' amendments presented with this Reply are not presented in response to Barnard and Akiyoshi, and Applicants therefore respectfully *traverse the rejections based on Barnard and Akiyoshi*.

Barnard discloses that a "control and calculating apparatus (37) within the base station can determine the ephemeris (course) information for the satellites and can measure the transmission times or propagation delays of signals between the satellites and the vehicle and with this information the control and calculating apparatus can calculate the position of the vehicle unit" (Abstract). The "base station uses the GPS to determine *its own position* [i.e., the position of the base station] and, since this is already known accurately, can calculate an up to date error term for the GPS" (6:53-56; emphasis added). Barnard's base station receives data relating to "its own position"—not relating to the position of the vehicle. In other words, Barnard's base station receives data relating to a *first* object (base station), and Barnard's vehicle receives data relating to a *second* object (vehicle).[3] For at least that reason, Barnard does not disclose or contemplate, alone or in combination with the other references, both "receiving, from

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[2] The Examiner asserts "the second data is received from a mobile target unit (note the mobile camera is used . . .)" (Office Action, page 7). Regardless of if Moengen's camera receives "second data," it is clear from Moengen that nothing from Moengen's camera is used to "generate object location information." Moengen explicitly states, "the position of [Moengen's] object N is . . . *solely* determined by distance measurements" (6:39-43; emphasis added), which explicitly excludes using any image data received through the cameras to determine position or location.

[3] Barnard explicitly contradicts the Examiner's characterization of Barnard. The Examiner states, "Barnard teaches a system (fig. 3) comprising: a communicator (36 and 38 of fig. 3) configured to receive first data associated with an object (e.g. 38 of fig. 3, receiving data from the satellites, 11-14 of fig. 3, an object, 15 of fig. 3)" (Office Action, page 12). As noted above, Barnard states that the base station does not receive data from the satellites regarding the vehicle's location—"The base station uses the GPS to determine *[the base station's] position*" (Barnard 6:53-54; emphasis added).

a fixed detector, first data associated with *an object*; [and] receiving, from a mobile target unit, second data associated with *the object*" as recited in claim 31 (emphasis added), and as similarly recited in claim 24. Applicants therefore respectfully request withdrawal of these rejections.

For at least the reasons discussed above, Applicants respectfully request allowance of claims 24, 27, and 31.

Dependent claims 25-30, 32-33, and 39-53 variously depend from independent claims 24 and 31. Therefore, Applicants assert that dependent claims 25-30, 32-33, and 39-53 are patentable for at least the same reasons stated above for differentiating independent claims 24 and 31, as well as in view of their own respective features

In view of the above remarks, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and are allowable over the cited references. Accordingly, Applicants respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject application. The Commissioner is authorized to charge any fees due to Deposit Account No. 19-2814.

Respectfully submitted,

Dated: _____7/31/09_____

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